

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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CANT STOP PRODUCTIONS, INC.,

Plaintiffs,

Case No.: 7:17-cv-06513
(CS) (LMS)

-against-

SIXUVUS, LTD., ERIC ANZALONE,
ALEXANDER BRILEY, FELIPE ROSE,
JAMES F. NEWMAN, RAYMOND SIMPSON,
and WILLIAM WHITEFIELD,

Defendants.

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DECLARATION OF GARY ADELMAN IN SUPPORT OF DEFENDANTS'
MOTION TO ENFORCE THE SETTLEMENT AGREEMENT

GARY ADELMAN, pursuant to 28 U.S.C. § 1746, declares under the penalty of perjury, as follows:

1. I am an attorney for the Defendants in this action and submit this declaration in support of Defendants' motion.
2. Annexed hereto as Exhibit 1 is a true and correct copy of the transcript of the hearing held in front of the Hon. Cathy Seibel on March 16, 2018.
3. Annexed hereto as Exhibit 2 is a true and correct copy of the Court Reporter corrected transcript of the hearing held in front of the Hon. Lisa M. Smith on March 28, 2018.
4. Annexed hereto as Exhibit 3 is a true and correct copy of the April 12, 2018 email I received from Plaintiff's attorney Stewart Levy.

5. Annexed hereto as Exhibit 4 is a true and correct copy of the April 21, 2018 email I received from my co-counsel Sarah M. Matz, which was also sent to Plaintiff's counsel Stewart Levy.

6. Annexed hereto as Exhibit 5 is a true and correct copy of the April 23, 2018 email I received from Plaintiff's attorney Stewart Levy.

7. Annexed hereto as Exhibit 6 is a true and correct copy of the April 25, 2018 email I received from Plaintiff's attorney Stewart Levy.

8. Annexed hereto as Exhibit 7 is a true and correct copy of the clean version of the draft written agreement, that I sent to Judge Smith's chambers in advance of the May 4, 2018 conference.

9. Annexed hereto as Exhibit 8 is a true and correct copy of the transcript of the hearing held in front of the Hon. Lisa M. Smith on May 4, 2018.

10. Annexed hereto as Exhibit 9 is a true and correct copy of a letter dated May 17, 2018 sent by Intervenor.

11. Annexed hereto as Exhibit 10 are true and correct copies of screenshots of Sixuvus' Facebook page, last accessed on May 25, 2018.

12. Annexed hereto as Exhibit 11 is a true and correct copy of a letter dated May 24, 2018 I sent to Stewart Levy.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on May 25, 2018, in New York, New York.



GARY ADELMAN